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JAMES EDWINI
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

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COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

John Sayya, *pro se*, et al.,

Plaintiffs,

v.

Waynoka Property Owners
Association, Inc., et al.,

Defendants.

) Case No.: 01-CV-459

) Senior District Judge Herman J. Weber

) PLAINTIFFS' RULE 26 DISCLOSURE

NOW COME Plaintiffs and submit their initial disclosure pursuant to Federal R. Civ. P.

26(a) (Rule 26(a)), as follows:

A. INDIVIDUALS WITH DISCOVERABLE INFORMATION:

1. All Defendants in the within cause.
2. All current and past board of trustee members of Waynoka Property Owners Association, Inc. (WPOA) and Waynoka Regional Water and Sewer District (WRWSD).
3. All past board of trustee members and employees Waynoka Utilities, Inc.
4. Defendant WPOA & WRWSD Legal Counsel, Jay D. Cutrell.
5. All current and past security guards and/or constables of WPOA.
6. All past and present employees of WPOA and WRWSD.
7. All past and present contracted management, employees and staff of WPOA outsourced business operations, such as marinas, restaurant, bar, etc.
8. Defendant Donald E. Fender, Inc.
9. Defendant James Bridges.
10. Defendant Milan Gorby.

11. Defendant Kamphaus, Henning & Hoods.
12. Defendant Robert Lund.
13. All other individuals named in Plaintiffs' Complaint
14. All persons identified by Plaintiffs
15. All persons identified by any other party.
16. Officials of Squire, Sanders & Dempsey.
17. Officials of the United States Department of Agriculture Farmers Home Administration.
18. Officials of the Brown County Prosecutor's Office.
19. Officials, staff and judges of the Brown County Common Pleas Court.
20. Officials and staff of the Brown County Clerk of Common Pleas Court.
21. Officials, judges and staff of the Supreme Court of Ohio.
22. Officials and staff of the Brown County Board of Commissioners.
23. Officials and staff of the Brown County Engineer.
24. Officials and staff of the Brown County Sheriff Department.
25. Officials and staff of the Brown County Health Department.
26. Officials and staff of the Brown County Records Office.
27. Officials and staff of the Georgetown Police Department.
28. Officials and staff of the United States Environmental Protection Agency.
29. Officials and staff of the Federal Bureau of Investigation in Cincinnati Ohio and Washington, D.C.
30. Officials and staff of the Ohio Environmental Protection Agency.
31. Officials and staff of the Ohio Department of Commerce, Division of Real Estate and Professional Licensing.
32. Officials and staff of the Ohio Attorney General.

33. Officials and staff of the Ohio Auditor of State.
34. Officials and staff of the Ohio Governor's Office.
35. Officials and staff of the Ohio House of Representatives.
36. Officials and staff of the Ohio Senate.
37. Officials and staff of the Ohio Criminal Justice Services Office.
38. Officials and staff of the Ohio Civil Rights Commission.
39. Officials and staff of the Ohio Organized Crime Investigative Commission.
40. Officials and staff of the Hamilton County Coroner's Office.
41. Pathologist Dr. Elliot M. Gross.
42. Bartender(s), employee(s), witness(es), WPOA Board of Trustee(s), and/or other(s) who may have witnessed and/or had been present and/or have knowledge concerning the "accidental shooting" of Mark Doss in or on the premises of the WPOA "Bar" on or about the evening of 27th day of August 1994.
43. Bartender(s), employee(s), witness(es), WPOA Board of Trustee(s), and/or other(s) who may have witnessed and/or had been present and/or have knowledge concerning any and all deaths that may have occurred during and/or after having had been served alcoholic beverages at the WPOA "bar."
44. Any and all witnesses who may have knowledge of partying with alcohol beverages and/or drugs by WPOA officials and/or staff and/or personnel and/or employee(s) at the Linda Curtiss home or at any other home at WPOA.
45. Any and all witnesses who may have knowledge of the "shooting death" of Linda Curtiss at her WPOA home.
46. All other individuals.

Plaintiffs reserve the right to supplement these responses as discovery progresses and prior to trial pursuant to Civil Rule 26.

B. DOCUMENTS:

1. All documents identified by Plaintiffs and Defendants either through responses to discovery or their Initial Rule 26 Disclosures.
2. All documents of and/or by WPOA Board of Trustee Member(s) and/or WPOA General Manager and/or officials and staff of WPOA concerning the "shooting death" of Mark Doss, and/or any other deaths that may have occurred during and/or after having been served alcoholic beverages at the WPOA "bar."
3. All documents of the Brown County Sheriff's Department concerning the "shooting death" of Mark Doss.
4. All documents of the Hamilton County Coroner's Office in Cincinnati Ohio concerning the "shooting death" of Mark Doss.
5. All documents of the Ohio Department of Commerce Division of Liquor Control concerning the "shooting death" of Mark Doss at the WPOA "bar," and all other deaths that may have occurred during and/or after having had been served alcoholic beverages at the WPOA "bar."
6. Business Records of WPOA and WRWSD.
7. Any and all leases, agreements and other related documents between Donald E. Fender, Inc., and WPOA from 1997 through the present.
8. Any and all records regarding real estate license of James Bridges from 1990 to the present, including transfers.
9. Any and all records regarding any and all real estate sales of James Bridges from 1990 to the present, identifying the names of purchasers and dates of sales.
10. Any and all records regarding real estate license of Milan Gorby from 1990 to the present, including transfers.

11. Any and all records regarding real estate sales of Milan Gorby from 1990 to the present, identifying the names of purchasers and dates of sales.
12. Any and all leases, agreements and other related documents between any real estate firm(s) and WPOA.
13. Any and all employment contract and/or agreements between any real estate agent(s) and WPOA.
14. All personal finance records of named defendants.
15. All and any purchases by named defendants of WPOA properties.
16. All work done (including, any materials used) on named defendant's WPOA property and or properties done by WPOA employees.

Plaintiffs reserve the right to supplement this list pursuant to the Federal Rules of Civil Procedures and Rules of this Court.

C. COMPUTATION OF DAMAGES:

1. Compensatory damages, punitive damages and all other damages and/or relief, financial or otherwise are to be assessed and made during or at end of trial.

D. INSURANCE AGREEMENTS:

1. Any and all insurance agreements and policies are to be made available to Plaintiffs.

IDENTITY OF PLAINTIFFS' EXPERT(S):

1. Forensic Accountant Terry Yoho, Certified Public Accountant, Master of Accountancy, Certified Fraud Examiner, Business Valuator Accredited in Litigation.
2. Franz and Mandel, Certified Public Accounting.
3. Document and Handwriting Examination Expert (yet to be named).
4. Home Owners Association Expert (yet to be named).
5. Home Owners Restrictive Covenant Expert (yet to be named).

6. Time and Motion Study Expert (yet to be named).
7. Computing Consultant (yet to be named).
8. Finance and Loan Consultant (yet to be named).
9. Forensic Management Consultant (yet to be named).

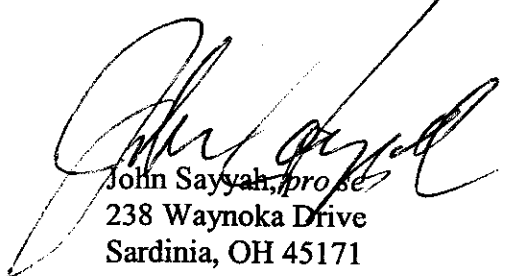
Plaintiffs reserve the right to supplement this list pursuant to the Federal Rules of Civil Procedures and Rules of this Court.

PRODUCTION OF EXPERT REPORT:

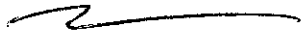
1. Fraud examiner's report not completed, ongoing work still in progress with additional on site inspection of WPOA financial records yet to be determined and analyzed.

CONCLUDING THOUGHT:

Realizing that there are many unforeseen needs yet to be determined upon discovery and other means, Plaintiffs always reserve the right to supplement this and any other list pursuant to the Federal Rules of Civil Procedures and Rules of this Court.



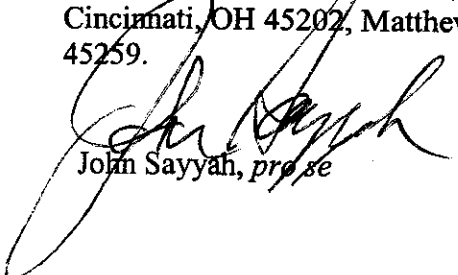
John Sayyah, *pro se*
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937-446-4136



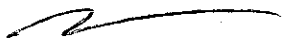
Brenda Frank, *pro se*
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937-446-4136

CERTIFICATION OF SERVICE

We hereby certify that a copy of the foregoing was served by U.S. Mail on this 19th day of August 2004 to Herbert Freeman, Attorney at Law, 114 East Eight Street, Cincinnati, OH, 45202, Stephen Yeager, Attorney at Law, One West Fourth Street, Suite 1800, Cincinnati, OH 45202, Michael P. Foley, Esq., 900 Fourth & Vine Tower, Five West Fourth Street, Cincinnati, OH 45202, Colleen Blandford, Attorney at Law, 1400 Carew Tower, 441 Vince Street, Cincinnati, OH 45202, Matthew Skinner, Attorney at Law, PO Box 145496, Cincinnati, Ohio 45259.



John Sayyah, *pro se*



Brenda Frank, *pro se*